

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

BHUPINDER SINGH

Plaintiff,

v.

Case: 3:23cv339

HARMANPREET SINGH,
and

KULBIR KAUR,
and

ARMAAN VA CORP. d/b/a LOVELY MARKET,

Defendants.

MOTION TO EXTEND TIME TO FILE ANSWER TO COMPLAINT

COMES NOW, Jacqueline W. Critzer, counsel for Harmanpreet Singh, and moves this Court, pursuant to Federal Rules of Civil Procedure 6, to extend the time for filing an Answer to the Complaint filed against him for the following reasons:

1. This matter was filed in the United States District Court, Eastern District of Virginia, Richmond Division on May 22, 2023.
2. Defendant, Harmanpreet Singh, was served by posted service on June 1, 2023.
3. The deadline by which Defendant Harmanpreet Singh was to file an Answer to the Complaint was 21 days after service; June 22, 2023.
4. The time by which Defendant Harmanpreet Singh was required to file an Answer to the Complaint expired, however this Court entered an Order on July 24, 2023 staying the case pending the outcome of the Criminal Complaint filed against Defendant Harmanpreet Singh.
5. This Court ordered Defendant Harmanpreet Singh to hire counsel or a notice of intent to proceed pro se and file an Answer to the Complaint by May 31, 2024.

6. On June 21, 2024 Plaintiff filed a Request for Entry of Default as to all three defendants.
7. On June 26, 2024 the clerk entered Default as to the three defendants.
8. On July 9, 2024 this Court ordered that Charles R. Samuels, Esquire either file a Notice of Appearance and an explanation as to why he allowed his client(s) to be in default of this action *or* to file a Statement in Response to the Letter Motion regarding his representation of one or more of the defendants by July 31, 2024.
9. Harmanpreet Singh is presently incarcerated in Pennsylvania.
10. Harmanpreet Singh's representative contacted the law firm of Critzer Cardani PC on July 24, 2024 and said Representation Agreement and retainer was negotiated and cleared by the undersigned's banking institution on July 30, 2024.
11. Scott D. Cardani, Esquire and Jacqueline W. Critzer, Esquire of Critzer Cardani PC filed a Notice of Appearance on July 31, 2024.
12. Contemporaneously with this Motion to Extend Time, Defendant Harmanpreet Singh's Answer is also being filed.
13. That the allowance of the late filed Answer will not prejudice the plaintiff in this matter.

WHEREFORE, Harmanpreet Singh prays this Court extends the time for filing his Answer and for any and other such relief as the Court deems necessary.

Respectfully Submitted:

Jacqueline W. Critzer
Scott D. Cardani

By: /s/ Jacqueline W. Critzer, Esq.
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CERTIFICATION OF SERVICE

I hereby certify that on July 31, 2024, I mailed the Motion to Extend Time by electronic mail or first class mail, postage pre-paid to the Craig Juraj Curwood, Esquire (craig@butlercurwood.com) and Samantha R Galina, Esquire (samantha@butlercurwood.com) at Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, Virginia 23219.

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